UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM
MARSH RICE UNIVERSITY, VANDERBILT
UNIVERSITY, and YALE UNIVERSITY,

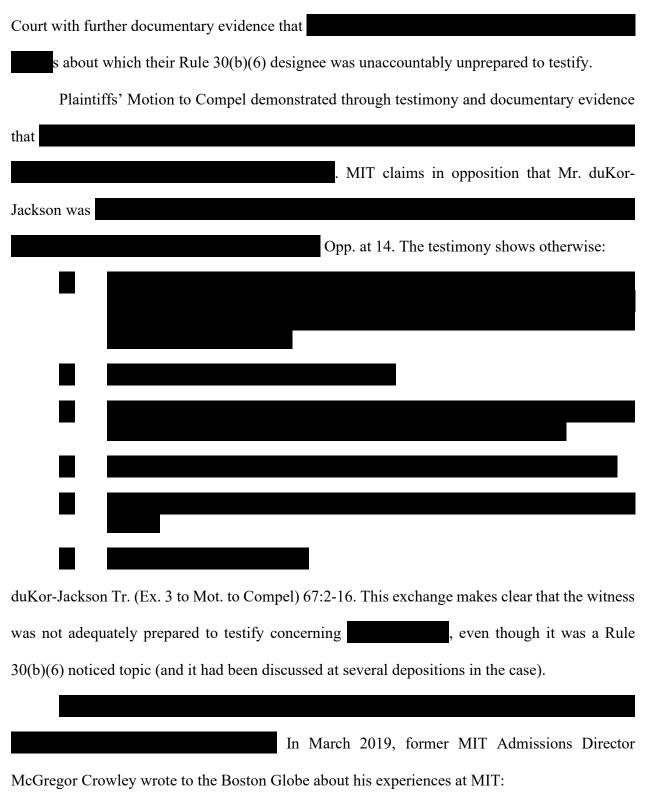
Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

PLAINTIFFS' REPLY MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION TO COMPEL MIT TO REOPEN ITS 30(b)(6) DEPOSITION FOR LIMITED PURPOSES

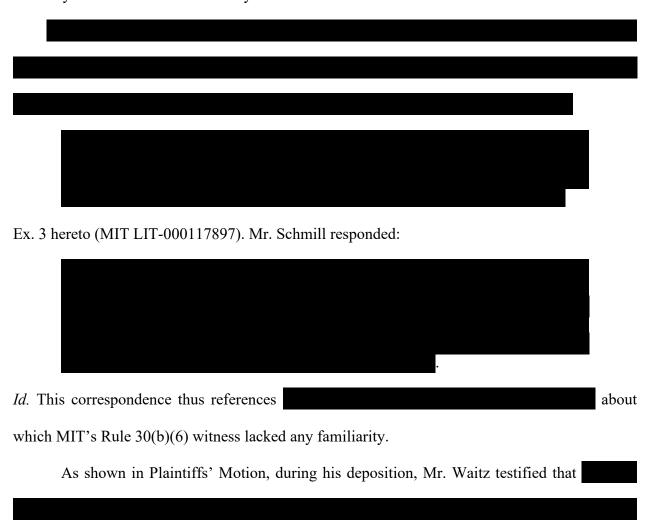
Plaintiffs respectfully request that the Court consider this Reply Memorandum and the attached exhibits in further support of their Motion to Compel so that Plaintiffs may respond to certain assertions in MIT's Opposition to Plaintiffs' Motion to Compel ("Opp.") and provide the



[I]n truth, for every office of admissions there is a development office that builds a university's endowment through donations from alumni and wealthy individuals. And every year, regardless of what a college or university says publicly, a number

of children of wealthy donors and alumni get a nod in their direction while other applicants are rejected.

Ex. 1 hereto.¹ In December 2019, the *Boston Globe* cited Mr. Crowley's letter in an editorial writing that "contrary to the publicly stated policy of the institute, it, like other universities has routinely favored children of wealthy donors and alumni." Ex. 2 hereto.



¹ Likewise, following her resignation after it was discovered that she had falsified her resume and credentials, MIT's former Dean of Admissions for the years 1999-2007, wrote that to be admitted to MIT, an applicant needs a "hook," which she defined as an "institutional need, something the schools want but will never tell the public about" and specifically mentioned "children of major donors or celebrities." Ex. 4 hereto. She later authored a presentation that explained that colleges admit students to satisfy their "Institutional Needs" which include creating "financial stability within the school's cultural context by assuring that certain populations are admitted and enrolled" and these needs are "not communicated to the public." Ex. 5 hereto.

| . MIT now claims |
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| in its Opposition that |
| . Not so. MIT's contemporaneous internal documents support Mr. Waitz's |
| testimony and show that as shown in Exhibits |
| 24 and 25 to the Motion to Compel, but also See Ex. 6 (MITLIT000124248). ² |
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| Id. (emphasis added). This further supports Plaintiffs' argument that |
| that MIT did not prepare its Rule 30(b)6) witness |
| to discuss even though Plaintiffs Rule 30(b)(6) Notice covered |
| Finally, MIT in opposition claims that MIT's Dean of Admissions |
| |
| (Br. at 4). MIT's pre-litigation, contemporaneous internal |
| documents, including undercuts this |
| claim as well. See Ex.5 to the Motion (MITLIT-000089375). |
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| |
| Id. |
| ² An email from December 22, 2018 (MITLIT-000124345) (Ex. 7) references a |

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Id. (emphasis added).

Dated: May 23, 2024

By:/s/Robert D. Gilbert

Robert D. Gilbert Elpidio Villarreal Robert S. Raymar Natasha Zaslove

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Respectfully Submitted,

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